

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, ex rel.)
LOUIS LONGO,)

Plaintiff-Relator)

v.)

Case No. 2:17-cv-01654-MJH

WHEELING HOSPITAL, INC.,)
R&V ASSOCIATES, LTD., and)
RONALD L. VIOLI)

Defendants.)

DECLARATION OF LISABETH SHOULDERS

I, Lisabeth Shoulders, hereby declare as follows:

1. I am an adult over the age of eighteen (18) and a resident of the State of West Virginia.

2. The information contained in this Declaration is based on my personal knowledge.

If called to testify, I would state as follows:

3. I currently am a Group Practice Manager at Wheeling Hospital ("Hospital") in Wheeling, West Virginia, where I have been employed since December 1996.

4. In my position as a Group Practice Manager, I have an opportunity to observe and acquire information regarding the patient schedules, weekly time cards, and other practice group information of each Hospital physician whose practice I am assigned to manage.

5. During my tenure as a Group Practice Manager, I worked with the following physicians while they were employed by the Hospital: Drs. Jessica Ybanez-Morano, John Wolen and Christopher Mascarenhas.

6. With respect to Drs. Ybanez-Morano, Wolen and Mascarenhas, their patient files are located, to the extent they are in paper format, either on the Hospital's campus or at an off-site storage facility maintained by the Hospital in Wheeling. These physicians' electronic medical records are stored at the Hospital in Wheeling. In addition, all billing records for these physicians are stored electronically at the Hospital.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 9, 2019
in Wheeling, West Virginia

Lisabeth a Shoulders
Lisabeth Shoulders